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BY ECF

Hon. Colleen McMahon, United States District Judge
United States District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: *In Re: New York City Policing During Summer 2020 Demonstrations*,
20-cv-8924 (CM)(GWG) –
This filing is related to *Hernandez*, 21-cv-7406 and *Minett*, 21-cv-8161**

Your Honor:

I am co-counsel for the Plaintiffs in *Hernandez, et al. v. City of New York, et al.*, and *Minett v. City of New York, et al.*, which have been consolidated with the *In Re: New York City Policing During Summer 2020 Demonstrations*, 20-cv-8924 (CM)(GWG) docket. I write to ask the Court to extend the March 24, 2023 deadline by which Plaintiffs must file any application(s) for attorney's fees, costs, and expenses in either matter until April 21, 2023. Defendants do not oppose this application. Plaintiffs and/or the parties have previously asked the Court to extend these deadlines several times, and the Court has granted each of those applications.

By way of background, the *Hernandez* and *Minett* Plaintiffs accepted Rule 68 offers some time ago. The parties negotiated as to Plaintiff's claims for attorney's fees, costs, and expenses and reached an agreement in principle on January 12, 2023. When Plaintiffs received proposed draft settlement paperwork from Defendants on February 8, 2023, Plaintiffs took issue with a number of the provisions in the draft papers. The parties have since exchanged e-mails and met and met and conferred this morning, successfully resolving all but two of the issues. As of this morning, there are only two remaining disputes for the parties to resolve. If the Court grants this application, the parties would use the additional time to attempt to resolve those disputes without Court intervention, if possible, and only make a further application to the Court if we are unable to do so.

Therefore, Plaintiffs ask that the Court extend the March 24, 2023 deadline by which the *Hernandez* and *Minett* Plaintiffs must file any fee application(s), if necessary, until April 21, 2023. As always, we thank the Court for its continued time and attention.

Respectfully submitted,

/S/

Gideon Orion Oliver